

DENNIS J. HERRERA, State Bar #139669
City Attorney
ELIZABETH S. SALVESON, State Bar #83788
Chief Labor Attorney
RUTH M. BOND, State Bar #214582
Deputy City Attorneys
Fox Plaza
1390 Market Street, 5th Floor
San Francisco, California 94102-5408
Telephone: (415) 554-3963
Facsimile: (415) 554-4248

Attorneys for Defendant
CITY AND COUNTY OF SAN FRANCISCO

PAUL J. SMOOT, SBN 160787
ANDERLINI, FINKELSTEIN, EMERICK & SMOOT
400 South El Camino Real, Suite 700
San Mateo, California 94402
Telephone: (650) 348-0102
Facsimile (650) 348-0962

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JAMES ARMSTRONG, et al.,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN
FRANCISCO and DOES 1-50
INCLUSIVE

Defendant.

CONNIE L. BROWN

Plaintiff,

vs.

CITY AND COUNTY OF SAN
FRANCISCO, et al.

Defendant.

Case No. C01-2611 VRW

**STIPULATION AND [PROPOSED]
ORDER**

Action Filed: July 9, 2001
Trial Date: None Set

1 The parties have previously requested continuances on two separate occasions due to
2 plaintiff Connie L. Brown's need for two neurosurgeries to remove tumors. The parties also
3 requested a continuance because the schedule for Ms. Brown's follow-up treatment plan was
4 delayed for several months. The parties now seek a continuance for the following reasons:

5 First, the Deputy City Attorney assigned to represent the City and County of San
6 Francisco in this case, Terence Howzell, recently changed positions and the case has been re-
7 assigned to Deputy City Attorney Ruth M. Bond. Due to the nature and complexity of this case,
8 Ms. Bond requires some time to familiarize herself with the facts and the record so that she may
9 prepare for, take and complete depositions, address the other outstanding discovery issues in this
10 case and prepare any dispositive motions. Currently there are no other available attorneys in
11 defense counsel's office who are sufficiently familiar with either the *Armstrong* action (C01-
12 2611 VRW) or the *Brown* action (C04-1536 VRW) to meet existing deadlines.

13 Second, Plaintiff continues to undergo a treatment plan for her neurosurgeries and
14 requires additional time to complete her recovery so that she may give her undivided attention to
15 her case. Given plaintiff's treatment plan, as well as plaintiff's counsel's scheduling constraints
16 the parties jointly and respectfully request a further continuance.

17 **IT IS HEREBY STIPULATED** by and between the parties hereto, through their
18 respective counsel as undersigned, that:

19 1. The non-expert discovery completion date be continued from the current deadline
20 of February 19, 2007 to June 26, 2007;

21 2. The filing deadline for dispositive motions, including summary judgment, be
22 continued from the current deadline of February 22, 2007 to June 29, 2007;

23 3. Hearing on the dispositive motions be continued from the currently scheduled
24 date of March 29, 2007 to August 2, 2007;

25 4. Expert discovery disclosure reports be continued from the currently scheduled
26 date of March 13, 2007 to July 27, 2007.

27 5. Expert discovery rebuttal completion date be continued from the currently
28 scheduled date of April 13, 2007 to August 27, 2007.

6. Completion of expert discovery be continued from the currently scheduled date of May 11, 2007 to September 27, 2007.

7. Pre-trial conference be continued from the currently scheduled date of June 6, 2007 to ~~October 26, 2007~~. October 23, 2007 at 9:00 AM.

Dated: January 11, 2007

Respectfully submitted,

DENNIS J. HERRERA
City Attorney

By: /s/Ruth M. Bond
RUTH M. BOND
Deputy City Attorney
Attorneys for Defendants

Dated: _____

By: _____
PAUL J. SMOOD
Attorney for Plaintiffs

IT IS SO ORDERED :
Dated: January 18, 2007

